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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

WILLAMETTE RIVERKEEPER, et al.,

Plaintiffs,

vs.

U.S. ARMY CORPS OF ENGINEERS, et al.,

Defendants.

Case No.: 6:17-cv-00801-MC

**PARTIES' STIPULATION AND  
[PROPOSED] ORDER RE  
DISCOVERY**

Pursuant to the parties' prior stipulation, on June 28, 2018, the Court entered an order setting deadlines for discovery in this case. ECF No. 31 at 2. Fact discovery concluded on September 21, 2018. The Court's June 28, 2018 Order set deadlines related to expert discovery, including an October 19, 2018 deadline for the parties to serve any expert reports. At this time, Plaintiffs intend to submit to Defendants a settlement offer related to some or all of the claims in this case, which Defendants intend to review and evaluate upon receipt. Accordingly, the parties have conferred, and stipulate to and respectfully request that the Court enter an order staying the deadlines for completion of expert discovery as set forth in the Court's June 28, 2018 Order.

If the parties are unable to agree upon settlement, they will inform the Court, and ask that it set new deadlines for completing expert discovery, if necessary.

Date: October 15, 2018.

Respectfully submitted,

/s/ Peter M.K. Frost

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/s/ Kaitlyn Poirier

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Attorney for Defendants

Pursuant to the stipulation of the parties, IT IS SO ORDERED.

Date: October \_\_\_, 2018.

\_\_\_\_\_  
Michael J. McShane

United States District Judge